IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

RAMIRO FELIX GONZALES,	§	
Plaintiff,	§	
	§	
v.	§	
	§	
BRYAN COLLIER, Executive	§	Civil Case No. 4:21-cv-00828
Director, Texas Department of	§	
Criminal Justice;	§	
	§	
BOBBY LUMPKIN, Director,	§	
Texas Department of Criminal	§	
Justice, Correctional Institutions	§	
Division;	§	EXECUTION
	§	SCHEDULED
and	§	FOR~JULY~13,~2022
	§	
DENNIS CROWLEY, Warden,	§	
Texas Department of Criminal	§	
Justice, Huntsville Unit,	§	
Defendants.	§	

PLAINTIFF'S UNOPPOSED MOTION REQUESTING THE COURT TO ISSUE A WRIT OF HABEAS CORPUS AD PROSEQUENDUM

This case is scheduled for trial on July 5 and 6, 2022. Dkt 36. The Plaintiff's attendance at trial is necessary. To allow Plaintiff the ability to attend trial, he respectfully requests that this Court issue a Writ of Habeas Corpus Ad Prosequendum ordering the Warden at the Texas Department of Criminal Justice's Polunsky Unit to deliver Plaintiff Ramiro Felix Gonzales

into the custody of the United States Marshal for the Southern District of Texas. A proposed order is enclosed.

Dated this 13th day of June, 2022.

Respectfully submitted,

JASON D. HAWKINS Federal Public Defender

/s/ Jeremy Schepers

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/s/ Steven T. Collis

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COUNSEL FOR PLAINTIFF GONZALES

CERTIFICATE OF WORD COUNT

Counsel	certifies	that	the	body	of	this	motion	contains	80	words,	
according to his word-processing program.											

<u>/s/ Jeremy Schepers</u> Jeremy Schepers

CERTIFICATE OF CONFERENCE

Counsel certifies that he conferred with opposing counsel, Leah O'Leary, and Defendants are unopposed to the relief requested in this motion.

/s/ Jeremy Schepers
Jeremy Schepers

CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2022, a copy of the foregoing motion was delivered via ECF to the Texas Attorney General's Office, Leah O'Leary, counsel for the Defendants, at leah.oleary@oag.texas.gov.

<u>/s/ Jeremy Schepers</u> Jeremy Schepers